

JONATHAN H. BLAVIN (State Bar No. 230269)  
Jonathan.Blavin@mto.com  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27th Floor  
San Francisco, CA 94105-2907  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077

VICTORIA A. DEGTYAREVA (State Bar No. 284199)  
Victoria.Degtyareva@mto.com  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, California 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

LAUREN BELL (pro hac vice)  
Lauren.Bell@mto.com  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue NW, Suite 500 E  
Washington, DC 20001  
Telephone: (202) 220-1100  
Facsimile: (202) 220-2300

*Attorneys for Defendant Snap Inc.*

*Additional parties and counsel listed on signature  
pages*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,

Plaintiff,

This Document Relates to:

ALL ACTIONS

Case No. 4:22-MD-03047-YGR

MDL No. 3047

Honorable Yvonne Gonzalez Rogers

**DEFENDANTS' UNOPPOSED  
ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE SUPPLEMENTAL  
AUTHORITY**

1 Pursuant to Civil Local Rules 7-11 and 7-3(d), Defendants Snap Inc.; Meta Platforms, Inc.  
2 f/k/a Facebook, Inc., Meta Payments, Inc., Meta Platforms Technologies, LLC, Facebook  
3 Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies,  
4 LLC, Instagram, LLC, Siculus, Inc., and Mark Elliot Zuckerberg; TikTok Inc., ByteDance Inc.,  
5 ByteDance Ltd., TikTok Ltd., and TikTok, LLC; YouTube, LLC, Google LLC, and Alphabet Inc.  
6 (collectively referred to hereinafter as the “Defendants”) submit this Unopposed Administrative  
7 Motion for Leave to File Supplemental Authority to bring to the Court’s attention the Ninth  
8 Circuit’s recent opinion, *Estate of Bride v. YOLO Techs., Inc.*, \_\_ F.4th \_\_, 2024 WL 3894341 (9th  
9 Cir. 2024). Defendants submit *Bride* (*see slip op.* at 17–23) in support of their Section 230  
10 arguments raised in the following motions: (1) Defendants’ Joint Motion to Dismiss Pursuant to  
11 Rule 12(b)(6) Plaintiffs’ Non-Priority Claims (ECF No. 516); (2) Defendants’ Motion to Dismiss  
12 the School District and Local Government Entities’ Master Complaint (ECF No. 601); and (3)  
13 Meta’s Motion to Dismiss the Multistate Attorneys General Complaint, Florida Attorney General  
14 Complaint, and Personal Injury Plaintiffs’ Consumer Protection and Misrepresentation Claims  
15 (ECF No. 517). A copy of the decision in *Bride*, which was issued after the completion of briefing  
16 and argument on the motions listed above, is attached hereto as Exhibit A.

1 Dated: August 27, 2024

Respectfully submitted,

2 **MUNGER, TOLLES & OLSON LLP**

3 /s/ Jonathan H. Blavin

Jonathan H. Blavin (State Bar No. 230269)

Jonathan.Blavin@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105-3089

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

Rose L. Ehler (State Bar No. 296523)

Rose.Ehler@mto.com

Victoria A. Degtyareva (State Bar No. 284199)

Victoria.Degtyareva@mto.com

Ariel T. Teshuva (State Bar No. 324238)

Ariel.Teshuva@mto.com

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, CA 90071-3426

Telephone: (213) 683-9100

Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*

Lauren.Bell@mto.com

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Ave., NW, Suite 500 E

Washington, D.C. 20001-5369

Telephone: (202) 220-1100

Facsimile: (202) 220-2300

*Attorneys for Defendant Snap Inc.*

**COVINGTON & BURLING LLP**

/s/ Mark W. Mosier

Mark W. Mosier, *pro hac vice*

mmosier@cov.com

Paul W. Schmidt, *pro hac vice*

pschmidt@cov.com

Phyllis A. Jones, *pro hac vice*

pajones@cov.com

COVINGTON & BURLING LLP

One CityCenter 850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Emily Johnson Henn (State Bar No. 269482)

ehenn@cov.com

COVINGTON & BURLING LLP

3000 El Camino Real 5 Palo Alto Square,  
10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

*Attorneys for Defendants Meta Platforms, Inc. f/k/a  
Facebook, Inc.; Meta Payments, Inc.; Meta  
Platforms Technologies, LLC; Facebook Holdings,  
LLC; Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

**FAEGRE DRINKER BIDDLE & REATH LLP**

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson, *pro hac vice*

andrea.pierson@faegredrinker.com

Amy Fiterman, *pro hac vice*

amy.fiterman@faegredrinker.com

Faegre Drinker LLP

300 N. Meridian Street, Suite 2500

Indianapolis, IN 46204

Telephone: + 1 (317) 237-0300

Facsimile: +1 (317) 237-1000

**KING & SPALDING LLP**

/s/ Geoffrey M. Drake

Geoffrey M. Drake, *pro hac vice*

gdrake@kslaw.com

David Mattern, *pro hac vice*

dmattem@kslaw.com

King & Spalding LLP

1 1180 Peachtree Street, NE, Suite 1600  
2 Atlanta, GA 30309  
3 Telephone: + 1 (404) 572-4600  
4 Facsimile: + 1 (404) 572-5100

*Attorneys for Defendants TikTok Inc., ByteDance  
Inc., ByteDance Ltd., TikTok Ltd., and TikTok, LLC*

**WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation**

/s/ Brian M. Willen

Brian M. Willen, *pro hac vice*  
Wilson Sonsini Goodrich & Rosati  
bwillen@wsgr.com  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
Telephone: (212) 999-5800  
Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)  
Wilson Sonsini Goodrich & Rosati  
lwhite@wsgr.com  
Andrew Kramer (State Bar No. 321574)  
akramer@wsgr.com  
Carmen Sobczak (State Bar No. 342569)  
csobczak@wsgr.com  
One Market Plaza, Spear Tower, Suite 3300  
San Francisco, CA 94105  
Telephone: (415) 947-2000  
Facsimile: (415) 947-2099

Christopher Chiou (State Bar No. 233587)  
Wilson Sonsini Goodrich & Rosati  
cchiou@wsgr.com  
Matthew K. Donohue (State Bar No. 302144)  
mdonohue@wsgr.com  
633 West Fifth Street  
Los Angeles, CA 90071-2048  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329

**MORGAN, LEWIS & BOCKIUS LLP**

/s/ Yarden R. Zwang-Weissman

Yarden R. Zwang-Weissman (SBN 247111)  
yardena.zwang-weissman@morganlewis.com  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071-3132  
Tel.: 213.612.7238

Brian Ercole (*pro hac vice*)  
brian.ercole@morganlewis.com

600 Brickell Avenue, Suite 1600  
Miami, FL 33131-3075  
Tel.: 305.415.3416

Stephanie Schuster (*pro hac vice*)  
Stephanie.schuster@morganlewis.com  
1111 Pennsylvania Avenue NW  
Washington, DC 20004-2541  
Tel.: 202.373.6595

**WILLIAMS & CONNOLLY LLP**

/s/ Joseph G. Petrosinelli

Joseph G. Petrosinelli  
jpetrosinelli@wc.com  
Ashley W. Hardin  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: 202-434-5000  
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC, Google  
LLC, and Alphabet Inc.*

**ATTESTATION**

I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 27, 2024

/s/ Jonathan H. Blavin  
Jonathan H. Blavin